

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

FEDEX SUPPLY CHAIN LOGISTICS
& ELECTRONICS, INC.,

Plaintiff,

vs.

JAMES E. GOODMAN, JR., JOHN
GOODMAN, JONATHAN GOODMAN,
JAKE GOODMAN, JOSEPH "JODY"
GOODMAN, JAMES FRINZI, SHALOM
AUERBACH, NEIL AUERBACH,
STEVEN ZAKHARYAYEV, EVALINA
PINKHASOVA, GENESIS NETWORKS
TELECOM SERVICES, LLC, GNET ATC,
LLC, GREATER TECH HOLDINGS, INC.
f/k/a GOODMAN TELECOM
HOLDINGS, LLC, GOODMAN
INVESTMENT HOLDINGS, LLC,
UNIFIED FIELD SERVICES, INC.,
AMERICAN METALS RECOVERY AND
RECYCLING, INC. a/k/a MBG
HOLDINGS, INC., MULTIBAND FIELD
SERVICES, INC., HSB HOLDINGS, LLC
f/k/a MULTIBAND GLOBAL
RESOURCES, LLC, AMR RESOURCES,
LLC, HUDSON CLEAN ENERGY
ENTERPRISES, LLC, 18920 NW 11th,
LLC, PROSPERITY BANCSHARES, INC.,
THE FRINZI FAMILY TRUST,
ALLIANCE TEXAS HOLDINGS, LLC,
AUERBACH PARTNERS, LP, and
ONEPATH SYSTEMS, LLC,

Civil Action No. 3:23-cv-02397

Defendants.

STEVEN ZAKHARYAYEV'S ANSWER TO PLAINTIFF'S THIRD AMENDED COMPLAINT

Steven Zakharyayev submits his Answer to Plaintiff's Third Amended Complaint. Except as otherwise expressly admitted, Steven Zakharyayev denies each and every allegation contained in Plaintiff's Third Amended Complaint.

NATURE OF THE ACTION

1. Steven Zakharyayev denies the allegations in Paragraph 1.
2. Steven Zakharyayev lacks the knowledge to admit or deny the allegations in Paragraph 2. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 2.
3. Steven Zakharyayev lacks the knowledge to admit or deny the allegations in Paragraph 3. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 3.
4. Steven Zakharyayev lacks the knowledge to admit or deny the allegations in Paragraph 4. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 4.
5. Steven Zakharyayev lacks the knowledge to admit or deny the allegations in Paragraph 5. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 5.

6. Steven Zakharyayev lacks the knowledge to admit or deny the allegations in Paragraph 6. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 6.

7. Steven Zakharyayev lacks the knowledge to admit or deny the allegations in Paragraph 7. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 7.

8. Steven Zakharyayev lacks the knowledge to admit or deny the allegations in Paragraph 8 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 8.

9. Steven Zakharyayev lacks the knowledge to admit or deny the allegations in Paragraph 9 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 9.

10. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 10 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 10.

11. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 11 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 11.

12. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 12 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 12.

13. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 13 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 13.

14. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 14 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 14.

15. Steven Zakharyayev lacks the knowledge to admit or deny the allegations in Paragraph 15. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 15.

16. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 16 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 16.

17. Steven Zakharyayev lacks the knowledge to admit or deny the allegations in Paragraph 17. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 17.

18. Steven Zakharyayev lacks the knowledge to admit or deny the allegations in Paragraph 18. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 18.

19. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 19 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 19.

20. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 20 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 20.

21. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 21 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 21.

22. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 22 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 22.

23. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 23 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 23.

24. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 24 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 24.

25. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 25 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 25.

26. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 26 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 26.

27. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 27 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 27.

28. Steven Zakharyayev denies the allegations in Paragraph 28.

PARTIES AND KEY PLAYERS

29. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 29 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 29.

30. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 30 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 30.

31. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 31 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 31.

32. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 32 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 32.

33. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 33 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 33.

34. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 34 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 34.

35. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 35 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 35.

36. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 36 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 36.

37. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 37 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 37.

38. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 38 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 38.

39. Steven Zakharyayev admits that he has a home in New Jersey. The remainder of Paragraph 39 contains legal conclusions to which a response is not required. To the extent an admission or denial is required, Steven Zakharyayev denies any allegation not otherwise admitted.

40. Steven Zakharyayev admits that Evelina Pinkhasova resides at the address identified in Paragraph 40. The remainder of Paragraph 40 contains legal conclusions to which a response is not required. To the extent an admission or denial is required, Steven Zakharyayev denies any allegation not otherwise admitted.

41. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 41 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 41.

42. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 42 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 42.

43. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 43 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 43.

44. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 44 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 44.

45. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 45 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 45.

46. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 46 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 46.

47. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 47 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 47.

48. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 48 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 48.

49. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 49 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 49.

50. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 50 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 50.

51. Steven Zakharyayev admits that 18920 NW 11th LLC is a Florida limited liability company, and that its principal place of business is 2719 Hollywood Blvd, Hollywood, FL 33020. The remainder of the paragraph contains legal conclusions to which no response is required.

52. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 52 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 52.

53. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 53 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 53.

54. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 54 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 54.

55. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 55 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 55.

56. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 56 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 56.

JURISDICTION AND VENUE

57. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 57 as the paragraph contains only legal conclusions. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 57.

58. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 58 as the paragraph contains only legal conclusions. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 58.

59. Steven Zakharyayev denies the allegations in Paragraph 59.

BACKGROUND AND FACTS

60. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 60 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 60.

61. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 61 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 61.

62. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 62 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 62.

63. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 63 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 63.

64. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 64 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 64.

65. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 65 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 65.

66. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 66 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 66.

67. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 67 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 67.

68. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 68 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 68.

69. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 69 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 69.

70. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 70 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 70.

71. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 71 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 71.

72. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 72 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 72.

73. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 73 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 73.

74. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 74 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 74.

75. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 75 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 75.

76. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 76 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 76.

77. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 77 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 77.

78. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 78 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 78.

79. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 79 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 79.

80. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 80 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 80.

81. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 81 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 81.

82. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 82 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 82.

83. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 83 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 83.

84. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 84 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 84.

85. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 85 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 85.

86. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 86 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 86.

87. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 87 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 87.

88. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 88 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 88.

89. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 89 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 89.

90. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 90 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 90.

91. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 91 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 91.

92. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 92 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 92.

93. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 93 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 93.

94. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 94 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 94.

95. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 95 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 95.

96. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 96 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 96.

97. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 97 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 97.

98. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 98 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 98.

99. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 99 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 99.

100. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 100 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 100.

101. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 101 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 101.

102. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 102 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 102.

103. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 103 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 103.

104. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 104 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 104.

105. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 105 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 105.

106. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 106 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 106.

107. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 107 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 107.

108. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 108 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 108.

109. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 109 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 109.

110. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 110 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 110.

111. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 111 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 111.

112. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 112 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 112.

113. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 113 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 113.

114. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 114 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 114.

115. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 115 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 115.

116. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 116 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 116.

117. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 117 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 117.

118. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 118 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 118.

119. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 119 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 119.

120. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 120 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 120.

121. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 121 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 121.

122. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 122 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 122.

123. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 123 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 123.

124. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 124 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 123.

125. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 125 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 125.

126. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 126 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 126.

127. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 127 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 127.

128. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 128 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 128.

129. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 129 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 129.

130. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 130 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 130.

131. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 131 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 131.

132. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 132 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 132.

133. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 133 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 133.

134. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 134 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 134.

135. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 135 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 135.

136. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 136 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 136.

137. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 137 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 137.

138. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 138 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 138.

139. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 139 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 139.

140. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 140 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 140.

141. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 141 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 141.

142. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 142 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 142.

143. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 143 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 143.

144. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 144 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 144.

145. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 145 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 145.

146. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 146 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 146.

147. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 147 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 147.

148. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 148 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 148.

149. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 149 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 149.

150. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 150 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 150.

151. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 151 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 151.

152. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 152 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 152.

153. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 153 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 153.

154. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 154 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 154.

155. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 155 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 155.

156. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 156 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 156.

157. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 157 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 157.

158. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 158 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 158.

159. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 159 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 159.

160. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 160 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 160.

161. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 161 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 161.

162. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 162 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 162.

163. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 163 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 163.

164. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 164 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 164.

165. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 165 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 165.

166. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 166 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 166.

167. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 167 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 167.

168. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 168 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 168.

169. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 169 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 169.

170. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 170 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 170.

171. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 171 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 171.

172. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 172 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 172.

173. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 173 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 173.

174. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 174 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 174.

175. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 175 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 175.

176. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 176 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 176.

177. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 177 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 177.

178. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 178 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 178.

179. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 179 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 179.

180. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 180 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 180.

181. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 181 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 181.

182. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 182 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 182.

183. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 183 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 183.

184. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 184 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 184.

185. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 185 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 185.

186. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 186 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 186.

187. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 187 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 187.

188. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 188 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 188.

189. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 189 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 189.

190. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 190 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 190.

191. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 191 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 191.

192. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 192 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 192.

193. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 193 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 193.

194. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 194 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 194.

195. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 195 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 195.

196. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 196 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 196.

197. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 197 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 197.

198. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 198 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 198.

199. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 199 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 199.

200. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 200 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 200.

201. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 201 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 201.

202. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 202 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 202.

203. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 203 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 203.

204. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 204 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 204.

205. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 205 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 205.

206. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 206 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 206.

207. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 207 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 207.

208. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 208 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 208.

209. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 209 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 209.

210. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 210 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 210.

211. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 211 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 211.

212. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 212 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 212.

213. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 213 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 213.

214. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 214 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 214.

215. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 215 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 215.

216. Steven Zakharyayev lacks the knowledge to admit or deny the allegations in Paragraph 216 as the allegations are directed at Steven Zakharyayev. To the extent an

admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 216.

217. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 217 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 217.

218. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 218 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 218.

219. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 219 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 219.

220. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 220 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 220.

221. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 221 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 221.

222. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 222 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 222.

223. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 223 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 223.

224. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 224 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 224.

225. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 225 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 225.

226. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 226 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 226.

227. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 227 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 227.

228. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 228 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 228.

229. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 229 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 229.

230. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 230 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 230.

231. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 231 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 231.

232. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 232 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 232.

233. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 233 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 233.

234. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 234 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 234.

235. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 235 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 235.

236. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 236 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 236.

237. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 237 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 237.

238. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 238 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 238.

239. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 239 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 239.

240. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 240 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 240.

241. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 241 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 241.

242. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 242 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 242.

243. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 243 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 243.

244. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 244 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 244.

245. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 245 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 245.

246. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 246 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 246.

247. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 247 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 247.

248. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 248 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 248.

249. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 249 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 249.

250. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 250 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 250.

251. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 251 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 251.

252. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 252 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 252.

253. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 253 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 253.

254. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 254 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 254.

255. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 255 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 255.

256. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 256 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 256.

257. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 257 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 257.

258. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 258 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 258.

259. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 259 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 259.

260. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 260 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 260.

261. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 261 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 261.

262. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 262 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 262.

263. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 263 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 263.

264. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 264 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 264.

265. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 265 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 265.

266. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 266 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 266.

267. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 267 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 267.

268. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 268 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 268.

269. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 269 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 269.

270. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 270 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 270.

271. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 271 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 271.

272. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 272 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 272.

273. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 273 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 273.

274. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 274 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 274.

275. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 275 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 275.

276. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 276 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 276.

277. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 277 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 277.

278. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 278 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 278.

279. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 279 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 279.

280. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 280 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 280.

281. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 281 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 281.

282. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 282 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 282.

283. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 283 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 283.

284. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 284 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 284.

285. Steven Zakharyayev denies the allegations in Paragraph 285.

286. Steven Zakharyayev admits that he was part of emails concerning the Trademark Acquisition Agreement but otherwise denies the allegations in Paragraph 286.

287. Steven Zakharyayev denies the allegations in Paragraph 287.

288. Steven Zakharyayev admits that he was part of emails concerning the Trademark Acquisition Agreement but otherwise denies the allegations in Paragraph 288.

289. Steven Zakharyayev denies the allegations in Paragraph 289.

290. Steven Zakharyayev denies the allegations in Paragraph 290.

291. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 291 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 291.

292. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 292 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 292.

293. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 293 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 293.

294. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 294 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 294.

295. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 295 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 295.

296. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 296 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 296.

297. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 297 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 297.

298. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 298 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 298.

299. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 299 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 299.

300. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 300 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 300.

301. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 301 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 301.

302. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 302 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 302.

303. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 303 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 303.

304. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 304 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 304.

305. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 305 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 305.

306. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 306 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 306.

307. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 307 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 307.

308. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 308 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 308.

309. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 309 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 309.

310. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 310 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 310.

311. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 311 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 311.

312. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 312 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 312.

313. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 313 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 313.

314. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 313 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 314.

315. Paragraph 315 is vague and ambiguous and therefore cannot be admitted or denied. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 315.

316. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 316 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 316.

317. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 317 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 317.

318. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 318 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 318.

319. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 319 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 319.

320. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 320 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 320.

321. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 321 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 321.

322. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 322 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 322.

323. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 323 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 323.

324. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 324 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 324.

325. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 325 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 325.

326. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 326 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 326.

327. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 327 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 327.

328. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 328 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 328.

329. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 329 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 329.

330. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 330 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 330.

331. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 331 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 331.

332. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 332 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 332.

333. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 333 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 333.

334. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 334 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 334.

335. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 335 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 335.

336. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 336 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 336.

337. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 337 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 337.

338. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 338 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 338.

339. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 339 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 339.

340. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 340 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 340.

341. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 341 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 341.

342. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 342 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 342.

343. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 343 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 343.

344. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 344 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 344.

345. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 345 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 345.

346. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 346 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 346.

347. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 347 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 347.

348. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 348 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 348.

349. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 349 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 349.

350. Steven Zakharyayev admits that he is an attorney and admits that he practices in New York and Florida. The remainder of Paragraph 350 is vague and ambiguous and therefore cannot be admitted or denied.

351. Steven Zakharyayev denies the allegations in Paragraph 351.

352. Steven Zakharyayev admits that 18920 purchased the preferred shares but otherwise denies the allegations in Paragraph 352.

353. Steven Zakharyayev admits that 18920 purchased preferred shares of Goodman Networks from James Goodman-controlled entities, but otherwise denies the allegations in Paragraph 353.

354. The first sentence of Paragraph 354 is vague and ambiguous, in that it does not identify what document it is referring to with the quoted language, and therefore this sentence cannot be admitted or denied. To the extent an admission or denial is required, Steven Zakharyayev denies the first sentence of Paragraph 354. The remainder of the allegations in Paragraph 354 are denied.

355. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 355 as the allegations are vague and ambiguous. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 355.

356. Steven Zakharyayev admits that 18920 purchased shares of preferred stock of Goodman Networks from James Goodman-controlled entities, but otherwise denies the allegations in Paragraph 356.

357. Steven Zakharyayev denies the allegations in Paragraph 357.

358. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 358 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 358.

359. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 359 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 359.

360. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 360 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 360.

361. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 361 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 361.

362. Steven Zakharyayev admits that 18920 made a demand to Goodman Networks on March 9, 2022 for a mandatory redemption of its preferred shares in Goodman Networks. He otherwise denies the allegations in Paragraph 362.

363. Steven Zakharyayev denies the allegations in Paragraph 363.

364. Steven Zakharyayev denies the allegations in Paragraph 364.

365. Steven Zakharyayev denies the allegations in Paragraph 365.

366. Steven Zakharyayev denies the allegations in Paragraph 366.

367. Steven Zakharyayev denies the allegations in Paragraph 367.

368. The allegations contained in Paragraph 368 are too vague to be able to admit or deny. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 368.

369. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 369 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 369.

370. Steven Zakharyayev denies the allegations in Paragraph 370.

371. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 371 to the extent the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 371.

372. Steven Zakharyayev denies the allegations in Paragraph 372.

373. Steven Zakharyayev denies the allegations in Paragraph 373.

374. The allegations contained in Paragraph 374 are too vague to be able to admit or deny. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 374.

375. Steven Zakharyayev admits that 18920 entered into a Trademark Acquisition Agreement with American Metals Recovery and Recycling Inc. The Trademark Acquisition Agreement is the best source for what it says, and Paragraph 375's paraphrasing of the agreement is vague and ambiguous and therefore cannot be admitted or denied. Steven Zakharyayev denies that 18920 was ever actually issued \$10,000 worth of preferred shares in AMRR.

376. Steven Zakharyayev denies the allegations in Paragraph 376.

377. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 377 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 377.

378. Steven Zakharyayev denies the allegations in Paragraph 378.

379. Steven Zakharyayev denies the allegations in Paragraph 379.

380. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 380 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 380.

381. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 381 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 381.

382. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 382 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 382.

383. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 383 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 383.

384. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 384 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 384.

385. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 385 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 385.

386. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 386 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 386.

387. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 387 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 387.

388. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 388 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 389.

389. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 390 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 390.

390. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 391 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 390.

391. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 391 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 391.

392. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 392 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 392.

393. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 393 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 393.

394. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 394 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 394.

395. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 395 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 395.

396. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 396 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 396.

397. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 397 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 397.

398. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 398 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 398.

399. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 399 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 399.

400. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 400 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 400.

401. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 401 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 401.

402. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 402 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 402.

403. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 403 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 403.

404. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 404 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 404.

405. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 405 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 405.

406. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 406 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 406.

407. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 407 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 407.

408. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 408 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 408.

409. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 409 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 409.

410. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 410 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 410.

411. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 411 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 411.

412. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 412 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 412.

413. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 413 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 413.

414. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 414 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 414.

415. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 415 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 415.

416. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 416 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 416.

417. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 417 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 417.

418. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 418 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 418.

419. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 419 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 419.

420. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 420 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 420.

421. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 421 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 421.

422. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 422 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 422.

423. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 423 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 423.

424. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 424 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 424.

425. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 425 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 425.

426. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 426 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 426.

427. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 427 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 427.

428. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 428 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 428.

429. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 429 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 429.

430. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 430 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 430.

431. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 431 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 431.

432. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 432 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 432.

433. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 433 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 433.

434. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 434 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 434.

435. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 435 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 435.

436. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 436 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 436.

437. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 437 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 437.

438. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 438 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 438.

439. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 439 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 439.

440. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 440 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 440.

441. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 441 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 441.

442. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 442 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 442.

443. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 443 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 443.

444. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 444 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 444.

445. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 445 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 445.

446. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 446 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 446.

447. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 447 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 447.

448. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 448 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 448.

449. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 449 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 449.

450. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 450 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 450.

451. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 451 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 451.

452. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 452 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 452.

453. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 453 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 453.

454. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 454 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 454.

455. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 455 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 455.

456. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 456 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 456.

457. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 457 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 457.

458. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 458 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 458.

459. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 459 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 459.

460. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 460 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 460.

461. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 461 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 461.

462. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 462 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 462.

463. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 463 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 463.

464. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 464 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 464.

465. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 465 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 465.

466. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 466 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 466.

467. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 467 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 467.

468. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 468 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 468.

469. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 469 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 469.

470. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 470 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 470.

471. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 471 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 471.

472. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 472 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 472.

473. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 473 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 473.

474. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 474 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 474.

475. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 475 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 475.

476. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 476 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 476.

477. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 477 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 477.

478. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 478 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 478.

CAUSES OF ACTION

Cause No. 1 – Violation of Civil R.I.C.O. 18 U.S.C. § 1961 et seq.

479. Steven Zakharyayev admits or denies the facts alleged in the preceding paragraphs in accordance with his answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

480. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 480 as it calls for a legal conclusion. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 480.

481. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 481 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 481.

482. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 482 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 482.

483. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 483 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 483.

484. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 484 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 484.

485. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 485 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 485.

486. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 486 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 486.

487. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 487 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 487.

488. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 488 as the allegations are directed at another party and are too vague to admit or deny. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 488.

489. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 489 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 489.

490. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 490 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 490.

491. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 491 to the extent the allegations are directed at another party. Steven Zakharyayev denies

the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 491.

492. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 488 as the allegations are directed at another party and are too vague to admit or deny. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 488.

493. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 493 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 493.

494. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 494 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 494.

495. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 495 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 495.

496. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 496 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 496.

497. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 497 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 497.

498. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 498 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 498.

499. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 499 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 499.

500. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 500 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 500.

501. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 501 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 501.

502. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 502 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 502.

503. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 503 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 503.

504. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 504 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 504.

505. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 505 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 505.

506. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 506 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 506.

507. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 507 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 507.

508. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 508 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 508.

509. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 509 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 509.

510. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 510 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 510.

511. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 511 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 511.

512. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 512 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 512.

513. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 513 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 513.

514. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 514 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 514.

515. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 515 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 515.

516. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 516 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 516.

517. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 517 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 517.

518. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 518 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 518.

519. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 519 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 519.

520. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 520 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 520.

521. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 521 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 521.

522. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 522 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 522.

523. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 523 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 523.

524. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 524 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 524.

525. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 525 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 525.

526. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 526 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 526.

527. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 527 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 527.

528. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 528 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 528.

529. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 529 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 529.

530. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 530 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 530.

531. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 531 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 531.

532. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 532 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 532.

533. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 533 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 533.

534. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 534 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 534.

535. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 535 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 535.

536. Steven Zakharyayev denies the allegations in Paragraph 536.

537. Steven Zakharyayev denies the allegations in Paragraph 537.

538. Steven Zakharyayev denies the allegations in Paragraph 538.

539. Steven Zakharyayev denies the allegations in Paragraph 539.

540. Paragraph 540 contains only a legal conclusion which cannot be admitted or denied. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 540.

541. The allegations in Paragraph 541 are too vague to admit or deny, and therefore Steven Zakharyayev denies the allegations in Paragraph 541.

542. Steven Zakharyayev denies the allegations in Paragraph 542.

543. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 543 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 543.

544. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 544 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 544.

545. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 545 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 545.

546. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 546 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 546.

547. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 547 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 547.

548. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 548 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 548.

549. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 549 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 549.

550. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 550 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 550.

551. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 551 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 551.

552. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 552 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 552.

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553. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 553 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 553.

554. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 554 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 554.

555. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 555 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 555.

556. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 556 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 556.

557. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 557 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 557.

558. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 558 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 558.

559. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 559 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 559.

560. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 560 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 560.

561. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 561 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 561.

562. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 562 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 562.

563. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 563 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 563.

564. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 564 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 564.

565. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 565 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 565.

566. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 566 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 566.

567. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 567 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 567.

568. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 568 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 568.

569. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 569 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 569.

570. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 570 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 570.

571. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 571 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 571.

572. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 572 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 572.

573. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 573 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 573.

574. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 574 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 574.

575. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 575 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 575.

576. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 576 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 576.

577. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 577 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 577.

578. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 578 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 578.

579. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 579 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 579.

580. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 580 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 580.

581. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 581 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 581.

582. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 582 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 582.

583. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 583 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 583.

584. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 584 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 584.

585. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 585 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 585.

586. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 586 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 586.

587. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 587 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 587.

588. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 588 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 588.

589. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 589 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 589.

590. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 590 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 590.

591. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 591 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 591.

592. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 592 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 592.

593. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 593 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 593.

594. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 594 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 594.

595. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 595 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 595.

596. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 596 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 596.

597. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 597 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 597.

598. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 598 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 598.

599. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 599 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 599.

600. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 600 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 600.

601. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 601 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 601.

602. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 602 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 602.

603. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 603 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 603.

604. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 604 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 604.

605. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 605 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 605.

606. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 606 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 606.

607. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 607 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 607.

608. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 608 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 608.

609. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 609 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 609.

610. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 610 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 610.

611. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 611 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 611.

612. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 612 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 612.

613. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 613 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 613.

614. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 614 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 614.

615. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 615 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 615.

616. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 616 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 616.

617. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 617 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 617.

618. Steven Zakharyayev denies the allegations in Paragraph 618.

619. Steven Zakharyayev denies the allegations in Paragraph 619.

620. Steven Zakharyayev denies the allegations in Paragraph 620.

621. Steven Zakharyayev denies the allegations in Paragraph 621.

622. Steven Zakharyayev denies the allegations in Paragraph 622.

623. Steven Zakharyayev denies the allegations in Paragraph 623.

624. Steven Zakharyayev denies the allegations in Paragraph 624.

625. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 625 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 625.

626. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 626 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 626.

627. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 627 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 627.

628. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 628 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 628.

629. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 629 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 629.

630. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 630 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 630.

631. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 631 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 631.

632. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 632 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 632.

633. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 633 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 633.

634. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 634 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 634.

18 U.S.C. § 1962(d)

635. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 635 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 635.

636. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 636 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 636.

637. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 637 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 637.

638. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 638 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 638.

639. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 639 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 639.

640. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 640 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 640.

641. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 641 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 641.

642. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 642 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 642.

643. Steven Zakharyayev denies the allegations in Paragraph 643.

644. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 644 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 644.

645. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 645 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 645.

646. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 646 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 646.

647. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 647 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 647.

648. Steven Zakharyayev denies the allegations in Paragraph 648.

649. Steven Zakharyayev denies the allegations in Paragraph 649.

650. Steven Zakharyayev denies the allegations in Paragraph 650.

Cause No. 2 – Theft (Embezzlement) Pursuant to Texas Theft Liability Act

Tex. Civ. Prac. & Rem. Code § 134.003 - .005

651. Steven Zakharyayev admits or denies the facts alleged in the preceding paragraphs in accordance with his answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

652. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 652 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 652.

653. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 653 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 653.

654. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 654 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 654.

655. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 655 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 655.

656. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 656 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 656.

657. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 657 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 657.

658. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 658 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 658.

659. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 659 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 659.

660. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 660 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 660.

661. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 661 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 661.

662. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 662 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 662.

663. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 663 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 663.

664. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 664 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 664.

665. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 665 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 665.

666. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 666 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 666.

667. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 667 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 667.

668. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 668 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 668.

669. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 669 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 669.

670. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 670 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 670.

Cause No. 3 – Common Law Theft/Embezzlement/Conversion

Against All Defendants

671. Steven Zakharyayev admits or denies the facts alleged in the preceding paragraphs in accordance with his answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

672. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 672 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 672.

673. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 673 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 673.

674. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 674 to the extent the allegations are directed at another party. Steven Zakharyayev denies

the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 674.

675. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 675 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 675.

676. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 676 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 676.

677. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 677 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 677.

678. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 678 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 678.

679. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 679 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 679.

680. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 680 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 680.

681. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 681 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 681.

682. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 682 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 682.

683. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 683 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 683.

684. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 684 to the extent the allegations are directed at another party. Steven Zakharyayev denies

the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 684.

685. Steven Zakharyayev denies the allegations in Paragraph 685.

686. Steven Zakharyayev denies the allegations in Paragraph 686.

Cause No. 4 – Common Law Unjust Enrichment

Against All Defendants

687. Steven Zakharyayev admits or denies the facts alleged in the preceding paragraphs in accordance with him answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

688. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 688 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 688.

689. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 689 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 689.

690. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 690 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 690.

691. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 691 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 691.

692. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 692 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 692.

693. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 693 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 693.

694. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 694 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 694.

695. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 695 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 695.

696. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 696 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 696.

697. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 697 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 697.

698. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 698 to the extent the allegations are directed at another party. Steven Zakharyayev denies the allegations to the extent directed at him. To the extent an admission or denial is otherwise required, Steven Zakharyayev denies the allegations in Paragraph 698.

699. Steven Zakharyayev denies the allegations in Paragraph 699.

700. Steven Zakharyayev denies the allegations in Paragraph 700.

**Cause No. 5 – Common Law Fraud or Constructive Fraud
Against Frinzi and James Goodman
And all Defendants which Received the Fraudulently Obtained Funds**

701. Steven Zakharyayev admits or denies the facts alleged in the preceding paragraphs in accordance with his answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

702. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 702 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 702.

703. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 703 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 703.

704. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 704 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 704.

705. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 705 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 705.

706. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 706 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 706.

707. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 707 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 707.

708. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 708 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 708.

709. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 709 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 709.

710. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 710 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 710.

711. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 711 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 711.

712. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 712 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 712.

713. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 713 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 713.

714. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 714 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 714.

715. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 715 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 715.

716. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 716 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 716.

717. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 717 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 717.

718. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 718 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 718.

719. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 719 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 719.

720. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 720 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 720.

721. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 721 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 721.

722. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 722 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 722.

723. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 723 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 723.

724. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 724 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 724.

725. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 725 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 725.

726. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 726 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 726.

727. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 727 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 727.

728. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 728 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 728.

729. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 729 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 729.

730. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 730 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 730.

731. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 731 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 731.

732. Steven Zakharyayev denies the allegations in Paragraph 732.

Cause No. 6 – Tortious Interference

Against Frinzi, James Goodman and Prosperity Bank

733. Steven Zakharyayev admits or denies the facts alleged in the preceding paragraphs in accordance with his answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

734. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 734 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 734.

735. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 735 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 735.

736. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 736 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 736.

737. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 737 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 737.

738. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 738 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 738.

739. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 739 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 739.

740. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 740 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 740.

741. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 741 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 741.

742. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 742 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 742.

743. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 743 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 743.

744. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 744 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 745.

745. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 746 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 745.

746. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 746 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 746.

747. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 747 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 747.

748. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 748 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 748.

749. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 749 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 749.

750. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 750 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 750.

751. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 751 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 751.

752. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 752 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 752.

753. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 753 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 753.

754. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 754 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 754.

755. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 755 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 755.

756. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 756 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 756.

757. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 757 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 757.

758. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 758 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 758.

759. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 759 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 759.

760. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 760 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 760.

761. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 761 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 761.

Cause No. 7 – Civil Conspiracy

Against All Defendants

762. Steven Zakharyayev admits or denies the facts alleged in the preceding paragraphs in accordance with his answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

763. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 763 as it sets forth a legal conclusion to which no response is required. To the extent an admission or denial is required, Steven Zakharyayev admits that FSCLE asserted such a claim but denies that the claim has any factual or legal validity.

764. Steven Zakharyayev admits or denies the facts alleged in the preceding paragraphs in accordance with his answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

765. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 765 as it sets forth a legal conclusion to which no response is required. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 765.

766. Steven Zakharyayev admits or denies the facts alleged in the preceding paragraphs in accordance with his answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

767. Steven Zakharyayev denies the allegations in Paragraph 767.

768. Steven Zakharyayev denies the allegations in Paragraph 768.

769. Steven Zakharyayev denies the allegations in Paragraph 769.

Cause No. 8 – Breach of Contract

Against Prosperity Bank

770. Steven Zakharyayev admits or denies the facts alleged in the preceding paragraphs in accordance with his answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

771. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 771 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 771.

772. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 772 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 772.

773. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 773 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 773.

774. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 774 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 774.

775. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 775 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 775.

776. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 776 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 776.

777. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 777 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 777.

778. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 778 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 778.

779. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 779 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 779.

780. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 780 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 780.

781. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 781 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 781.

782. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 782 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 782.

783. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 783 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 783.

784. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 784 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 784.

785. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 785 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 785.

786. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 786 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 786.

787. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 787 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 787.

788. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 788 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 788.

789. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 789 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 789.

Cause No. 9 – Negligence/Gross Negligence

Against Prosperity Bank

790. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 790 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 790.

791. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 791 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 791.

792. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 792 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 792.

793. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 793 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 793.

794. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 794 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 794.

795. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 795 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 795.

796. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 796 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 796.

797. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 797 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 797.

798. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 798 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 798.

799. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 799 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 799.

800. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 800 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 800.

801. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 801 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 801.

802. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 802 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 802.

803. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 803 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 803.

804. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 804 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 804.

805. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 805 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 805.

806. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 806 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 806.

807. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 807 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 807.

808. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 808 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 808.

809. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 809 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 809.

810. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 810 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 810.

811. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 811 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 811.

812. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 812 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 812.

813. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 813 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 813.

814. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 814 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 814.

Cause No. 10 – Violation of UCC Article 4A

Tex. Bus. & Com. Code § 4A,202

Against Prosperity Bank

815. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 815 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 815.

816. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 816 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 816.

817. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 817 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 817.

818. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 818 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 818.

819. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 819 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 819.

820. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 820 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 820.

821. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 821 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 821.

822. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 822 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 822.

823. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 823 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 823.

824. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 824 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 824.

825. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 825 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 825.

826. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 826 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 826.

827. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 827 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 827.

828. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 828 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 828.

829. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 829 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 829.

830. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 830 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 830.

831. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 831 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 831.

832. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 832 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 832.

833. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 833 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 833.

834. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 834 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 834.

835. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 835 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 835.

836. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 836 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 836.

837. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 837 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 837.

838. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 838 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 838.

839. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 839 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 839.

840. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 840 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 840.

841. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 841 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 841.

842. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 842 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 842.

843. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 843 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 843.

844. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 844 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 844.

845. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 845 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 845.

846. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 846 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 846.

847. Steven Zakharyayev cannot admit or deny the allegations in Paragraph 847 as the allegations are directed at another party. To the extent an admission or denial is required, Steven Zakharyayev denies the allegations in Paragraph 847.

PRAYER FOR RELIEF

The Prayer of Plaintiff's Third Amended Complaint does not include factual allegations for which a response is required. To the extent a response is deemed required, Steven Zakharyayev denies that the Plaintiff is entitled to the requested relief.

STEVEN ZAKHARYAYEV'S AFFIRMATIVE AND OTHER DEFENSES

1. Plaintiff has failed to state a claim against Steven Zakharyayev upon which relief can be granted.
2. Plaintiff's claims are barred, in whole or in part, by the doctrine of laches, acquiescence, waiver, equitable estoppel, and unclean hands.
3. Plaintiff's claims are barred, in whole or in part, because some or all of Plaintiffs lack standing to bring those claims.
4. Plaintiff's claims are barred, in whole or in part, by the doctrine of ratification.
5. Steven Zakharyayev acted reasonably and in good faith at all times.
6. The costs, damages, and penalties Plaintiff seeks to recover or impose are unreasonable, excessive, arbitrary, and capricious.
7. Plaintiff is not entitled to recover attorneys' fees or costs or fees of litigation.

8. Steven Zakharyayev reserves the right to plead additional defenses as may be appropriate depending upon facts later revealed during discovery.

STEVEN ZAKHARYAYEV'S REQUEST FOR RELIEF

WHEREFORE, Steven Zakharyayev prays that Plaintiff's claims be dismissed, and that this Court award Steven Zakharyayev his costs, and award such other and further relief to which he may be justly entitled.

DEMAND FOR JURY TRIAL

Steven Zakharyayev hereby demands a trial by jury on all issues so triable.

Respectfully submitted,

JORDAN, LYNCH & CANCIENNE
PLLC

/s/ Michael Cancienne

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COUNSEL FOR STEVEN ZAKHARYAYEV

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of June, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of this filing to all counsel of record in this case.

/s/ Michael Cancienne

Michael Cancienne